

1 **TIMOTHY H. BELLAS**

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5 **ATTORNEY FOR:** Defendant Yang

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7
8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE**
10 **NORTHERN MARIANA ISLANDS**

11 UNITED STATES OF AMERICA,)

12 Plaintiff,)

13)
14 v.)

15 YANG, JIAN ZHONG, *et al*,)

16 Defendants.)
17 _____)

CRIMINAL CASE NO. 07-00017-001

DECLARATION IN SUPPORT
OF STIPULATED EXTENSION
OF TIME TO FILE
PRE TRIAL MOTIONS

18 I, TIMOTHY H. BELLAS, declare the following:

19 1. I am licensed to practice before this Court; I am over the age of majority and
20 competent to testify as to the matters contained herein.
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22 2. I am the Court appointed attorney for the above named Defendant.

23 3. On June 5th, 2007 I sent a letter, via fax transmission to the U.S. Attorney's
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1 Office requesting discovery in the above matter by June 8th, 2007.

2 4. I received no communication in response to that letter.

3 5. On June 11th, 2007 I telephoned AUSA O'Malley who advised that the reason for
4 the failure to provide discovery is that there are several defendants whose cases are being
5 processed concurrently and it is likely that I will receive discovery no later than June 13th, 2007.
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7 6. However, the current deadline for filing pre trial motions, as set by the Court in
8 its May 31st, 2007 Order, is June 14th, 2007.

9 7. Therefore, there will be inadequate time for counsel to confer with his client
10 regarding the discovery.

11 8. There will also be inadequate time to prepare and file any pre trial motions
12 counsel deems appropriate, if the discovery is provided on the eve of the day that the motions
13 must be filed.
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15 9. Wherefore the parties, through their respective attorneys, have agreed that the
16 deadline to file such motions should be extended for one week to June 21st, 2007.

17 I declare under penalty of perjury that the foregoing statements are true and correct to the
18 best of my knowledge and belief and that this Declaration was executed on the ____ day June,
19 2007 on the island of Saipan, CNMI.
20

21 _____/s/_____
Timothy H. Bellas, Declarant
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